

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

KENNETH R. WOODARD,

Defendant.

UNDER SEAL

Case No. 1:25-MJ-375

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Benjamin House, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Postal Inspector for the United States Postal Inspection Service (USPIS), assigned to the Washington Division and currently stationed in Merrifield, Virginia. I have held this position since July 2023. I am currently assigned to conduct investigations involving postal crimes and violations of the federal code, including, but not limited to, mail theft, mail fraud, wire fraud, bank fraud, aggravated identity theft, and access device fraud. Prior to my role with the USPIS, I was a Special Agent with the United States Secret Service from September 2016 through July of 2023. In that role, I investigated multiple violations of the federal code, including wire fraud, bank fraud, identity theft, access device fraud, and violations of federal codes dealing with creating counterfeit obligations/securities of the United States. I attended the Criminal Investigator Training Program at the Federal Law Enforcement Training Center (FLETC), the U.S. Secret Service Special Agent Training Course at the Secret Service training facility, and Agent to Inspector Training through the USPIS Career Development Unit. I have received additional training in money laundering from FLETC.

2. I am submitting this affidavit in support of a criminal complaint and arrest warrant charging the defendant, Kenneth WOODARD (“WOODARD”) with making threats against federal officials, in violation of 18 U.S.C. § 115(a)(1)(B), and making threats over interstate communications, in violation of 18 U.S.C. § 875(c). As described more fully below, I obtained evidence indicating that WOODARD called the United States Postal Service (USPS) Customer Care Centers in Michigan and California from Virginia, and made threats to injure an employee of the United States during those calls. Specifically, there is probable cause to believe that, on May 13, 2025, in the Eastern District of Virginia, WOODARD called the USPS Customer Care Center multiple times. During three of those phone calls, WOODARD stated that he would kill a mail man the next time he saw one, he would go to a post office with a gun, and he would kill a USPS Customer Care Center employee. During the phone calls, WOODARD stated his name as Kenneth Woodard, and his address as 10846 Fairchester Dr., Fairfax, VA 22030 (“SUBJECT ADDRESS”). WOODARD called the USPS Customer Care Center from phone numbers 571-363-7090 (“SUBJECT PHONE 1”) and 571-638-9838 (“SUBJECT PHONE 2”), which are both registered to WOODARD.

3. The facts contained in this affidavit come from my personal observations and knowledge, my review of documents and other evidence, my training and experience, and information obtained from other agents, police officers, and witnesses involved in this investigation. All observations that were not made personally by me were related to me by persons with knowledge of this investigation whom I deem credible. This affidavit is intended to show that there is sufficient probable cause for the requested criminal complaint and arrest warrant, and does not set forth all facts known about this matter.

PROBABLE CAUSE

4. On May 13, 2025, at or around 12:23 p.m., WOODARD called the USPS Customer Care Center and spoke with USPS Employee 1, located in California, regarding a package that had been mailed through USPS and was associated with a tracking number ending in 6755 (the “Package”). USPS Employee 1 is an employee of the United States. WOODARD called the USPS Customer Care Center using SUBJECT PHONE 1.¹ During the phone call, WOODARD stated his name as Kenneth WOODARD and his address as the SUBJECT ADDRESS. WOODARD told USPS Employee 1 that, the next time WOODARD saw a mailman, he was going to “fucking kill him.” He continued, saying that, if the Package was not delivered the same day, he was “coming to the post office with a God damn gun.”

5. On May 13, 2025, at or around 1:22 p.m., WOODARD called the USPS Customer Care Center and spoke with USPS Employee 2, located in Michigan, regarding the Package. USPS Employee 2 is an employee of the United States. WOODARD called the USPS Customer Care Center using SUBJECT PHONE 2.² During the phone call, WOODARD stated his name as Kenneth WOODARD, his address as the SUBJECT ADDRESS, and his phone number as SUBJECT PHONE 1. WOODARD demanded that USPS Employee 2 get him his package, and then asked if USPS Employee 2 wanted him to “come down there with a gun.” WOODARD further warned, “You don’t want me to come down there. Trust me.” Later in the call, WOODARD stated that he is a United States Marine that owns guns. At the end of the phone call, WOODARD stated, “I’m coming down there with a gun.”

¹ Phone subscriber records show WOODARD as the liable party for SUBJECT PHONE 1.

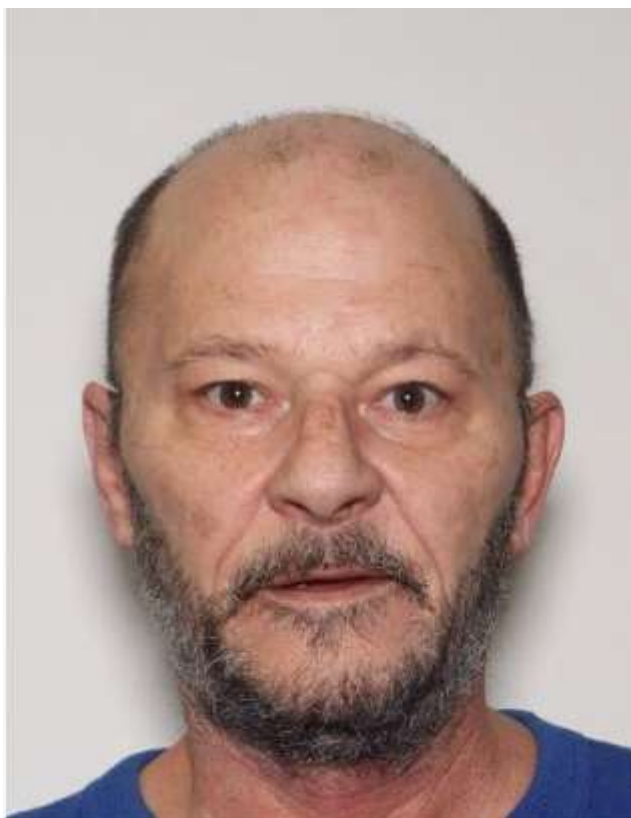
² Phone subscriber records show WOODARD as the liable party for SUBJECT PHONE 2.

6. On May 13, 2025, at or around 1:46 p.m., WOODARD called the USPS Customer Care Center and spoke with USPS Employee 3, located in Michigan, regarding the Package. USPS Employee 3 is an employee of the United States. WOODARD called the USPS Customer Care Center using SUBJECT PHONE 2. During the phone call, WOODARD stated his name as Kenneth WOODARD and confirmed his address as the SUBJECT ADDRESS. WOODARD confirmed that he was at the SUBJECT ADDRESS during the call. WOODARD said that he was a U.S. Marine sniper and that, if he has to go to the post office, he will go with a gun. After WOODARD was told that USPS Employee 3 was going to report WOODARD's threats, WOODARD then denied that the SUBJECT ADDRESS and SUBJECT PHONE 2 were attributable to him. WOODARD also then denied making threats. WOODARD later told USPS Employee 3, "I'm gonna fucking kill you." At the end of the phone call, WOODARD stated to USPS Employee 3, "You are a dead mother fucker," and "You're a dead bitch."

7. Later on May 13, 2025, your affiant received the report that WOODARD had called the USPS Customer Care Center regarding the Package. The report stated that, during the phone call, WOODARD expressed that he was unhappy that the package was not delivered, and he stated that he would go to the post office with a gun. Your affiant and another Postal Inspector called WOODARD at SUBJECT PHONE 2. When WOODARD answered, your affiant identified himself as a federal agent with the USPIS. WOODARD responded that he was a U.S. Marine sniper, he knows how to put a bullet in someone, and he didn't care that we were the "F.B.I." WOODARD demanded that his package get delivered, or he would sit outside a local post office and put a bullet in someone's head. Your affiant told WOODARD that making threats was against the law, and WOODARD stated that he did not care. WOODARD told your affiant that he had four mean German Shepherds, and he described owning three firearms—specifically a .45, .44,

and a 500 Smith & Wesson. WOODARD told Postal Inspectors that, if they come to his house, they better come with firepower. At the end of the phone call, WOODARD said that he was outside with guns and was not currently at his house.

8. WOODARD is a convicted felon and is prohibited from owning firearms. He was identified through cell phone subscriber information, law enforcement database searches, and DMV records, which list WOODARD's address as the SUBJECT ADDRESS. WOODARD's driver's license photo is below.

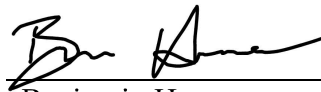


9. In summary, based on my investigation, I believe WOODARD threatened USPS employees and did so using interstate communications.

CONCLUSION

10. I respectfully submit that the foregoing facts established in this affidavit demonstrate probable cause that KENNETH WOODARD threatened federal officials, in violation of 18 U.S.C. § 115(a)(1)(B) and made the threats over interstate communications in violation of 18 U.S.C. § 875(c). Accordingly, I respectfully request that the Court issue the proposed criminal complaint and arrest warrant.

Respectfully submitted,



Benjamin House
Postal Inspector
United States Postal Inspection Service

Respectfully submitted and attested to in
accordance with the requirements of Fed. R.
Crim. P. 4.1 by telephone on June 13, 2025.

Lindsey R Vaala

Digitally signed by Lindsey R
Vaala

Date: 2025.06.13 16:52:43 -04'00'

The Honorable Lindsey R. Vaala
United States Magistrate Judge
Alexandria, Virginia